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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No.00-41
Table of Allotments,	)	RM-9369
FM Broadcast Stations.	)	
(Oakville, Raymond and South Bend Washington)	)	

To: Chief, Policy and Rules Division

COMMENTS

Jodesha Broadcasting, Inc.("Jodesha"), by its attorney, hereby submits its Comments in the above-captioned rule making proceeding.

Jodesha is the proponent of the allotment changes proposed in this rule making proceeding. Its reasons for seeking the allotment changes are fully set out in its Petition for Rule Making and are incorporated herein by reference.

Attached hereto is an Engineering Statement which contains the gain and loss area studies with respect to the proposed reallotment of Channel 249C1 to Oakville, Washington, and the replacement of Channel 289C2 with Channel 300A at South Bend, Washington, that the Commission requested be submitted by Jodesha. As a preliminary matter, it is pointed out that it is Jodesha's present intention to operate Station KFMY on Channel 249C1 as an Oakville station from the station's existing transmitter site and that it is Jodesha's present intention to continue to operate Station KJET on Channel 289C2 as a Raymond

station from the station's existing transmitter site. Therefore, no actual gain or loss will result from the reallotment of either Channel 249C1 to Oakville or Channel 289C2 to Raymond. Nevertheless, in response to the Commission's request, the Engineering Statement does contain (i) a gain and loss analysis comparing the coverage of Station KFMY from its existing transmitter site with the coverage that the Station would realize if it were to operate from the Oakville Channel 249C1 reference site and (ii) a gain and loss analysis comparing the coverage of a station operating on Channel 300A at South Bend with the existing coverage of Station KJET.

The Channel 249C1 gain and loss analysis reflects that if KFMY were to relocate to the Oakville Channel 249C1 reference point, 35,230 persons and a land area of 1,119 km^2 would lose service from KFMY but would continue to receive service from at least 5 stations, whereas a total of 632 km^2 which presently receive fewer than 5 aural services would gain an aural service and 447 persons living in this area would be provided with a second aural service.

The gain and loss study with respect to the channel substitution at South Bend reflects that no area or population would lose any service from the substitution of Channel 300A for Channel 289C2, but that a total of 13,764 will gain a additional service as a consequence of the substitution.

Petitioner submits that channel reallotments that it has proposed will serve the public interest as they will result in Oakville, Washington, an incorporated community being provided with a first local transmission service and as they will also result in an additional aural service being provided to 13,797 person and an area of 1,942 km^2.

If proposed Channel changes are adopted, Jodesha will file applications for construction permits to change Station KFMY's channel assignment to Channel 249C1, Oakville, Washington, and KJET's channel assignment to Channel 289C2, Raymond, Washington and will promptly implement these changes in channel assignments following grant of the construction permits.

Respectfully submitted,

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Date: April 27, 2000

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ENGINEERING STATEMENT

IN SUPPORT OF COMMENTS IN MM DOCKET NO. 00-41

TO ASSIGN FM CHANNEL 249C1
FOR USE AT OAKVILLE, WA

TO ASSIGN FM CHANNEL 289C2
FOR USE AT RAYMOND, WA

AND TO ASSIGN FM CHANNEL 300A
FOR USE AT SOUTH BEND, WA

PREPARED FOR
JODESHA BROADCASTING, INC.

4/2000

Engineering Statement

This Engineering Statement has been prepared on behalf of Jodesha Broadcasting, Inc. ("Jodesha"), in support of the proposed reallotments in MM Docket No. 00-41.[1] In the Notice of Proposed Rulemaking in that docket, the Commission has requested the petitioner to provide gain and loss area studies for the allotment of Channel 249C1 at Oakville, and for the allotment of Channel 300A at South Bend.

Oakville Channel 249C1

Jodesha has not proposed to relocate the KFMY transmitter site in this proceeding. Nevertheless, since the authorized Class C1 operation of KFMY on Minot Peak (BPH-970923IE) is short-spaced to the licensed operation of KACI 249C2 at The Dalles, Oregon, a fully-spaced allotment site for KFMY at Oakville has been identified at NL 46° 57' 14" x WL 123° 29' 21".

As of the current date, KFMY is operating at Raymond as a Class A station (see BLH-841105DW and BMLH-970314KC). While the KFMY Raymond allotment was a Class C3 allotment at the time the petition for rulemaking was filed, that allotment was upgraded to Class C1 as a result of the recent grant of BPH-970923IE. The 60 dBu service areas of the present Class A operation and the prior Class C3 allotment are completely encompassed by the 60 dBu service areas of both the Class C1 construction permit and the fully-spaced Class C1 allotment

[1]The petition for rulemaking in MM Docket No. 00-41 proposed the reallotment of Channel 249C1 from Raymond to Oakville, the reallotment of Channel 289C2 from South Bend to Raymond, and the allotment of Channel 300A at South Bend.

site proposed herein. Therefore, it is only believed relevant to make a comparison of the authorized Class C1 construction permit and the fully-spaced Class C1 allotment site.

Gain & Loss Area Analysis

At the outset, it is to be noted that the allotment site has been identified solely for the purpose of establishing that a fully spaced site for the proposed allotment of Channel 249C1 at Oakville exists. However, as pointed out in Jodesha's Petition for Rulemaking, Station can operate on Channel 249C1 as an Oakville station from its existing transmitter site. Therefore, the reallotment of KFMY's channel from Raymond to Oakville and the operation of KFMY on Channel 249C1 as an Oakville station will not result in any gain or loss areas.

The authorized Class C1 operation of KFMY on Minot Peak provides 60 dBu service to 385,096 persons in a 14,232 km² land area[2]. If KFMY were to operate from the allotment site, 60 dBu service would be provided to 351,213 persons in a 14,029 km² land area, with a gain of 1,347 persons in a 710 km² land area, and a loss of 35,230 persons in a 1,119 km² land area.

Underserved Area Analysis

100% percent of the hypothetical loss area and 100% of the hypothetical loss population will

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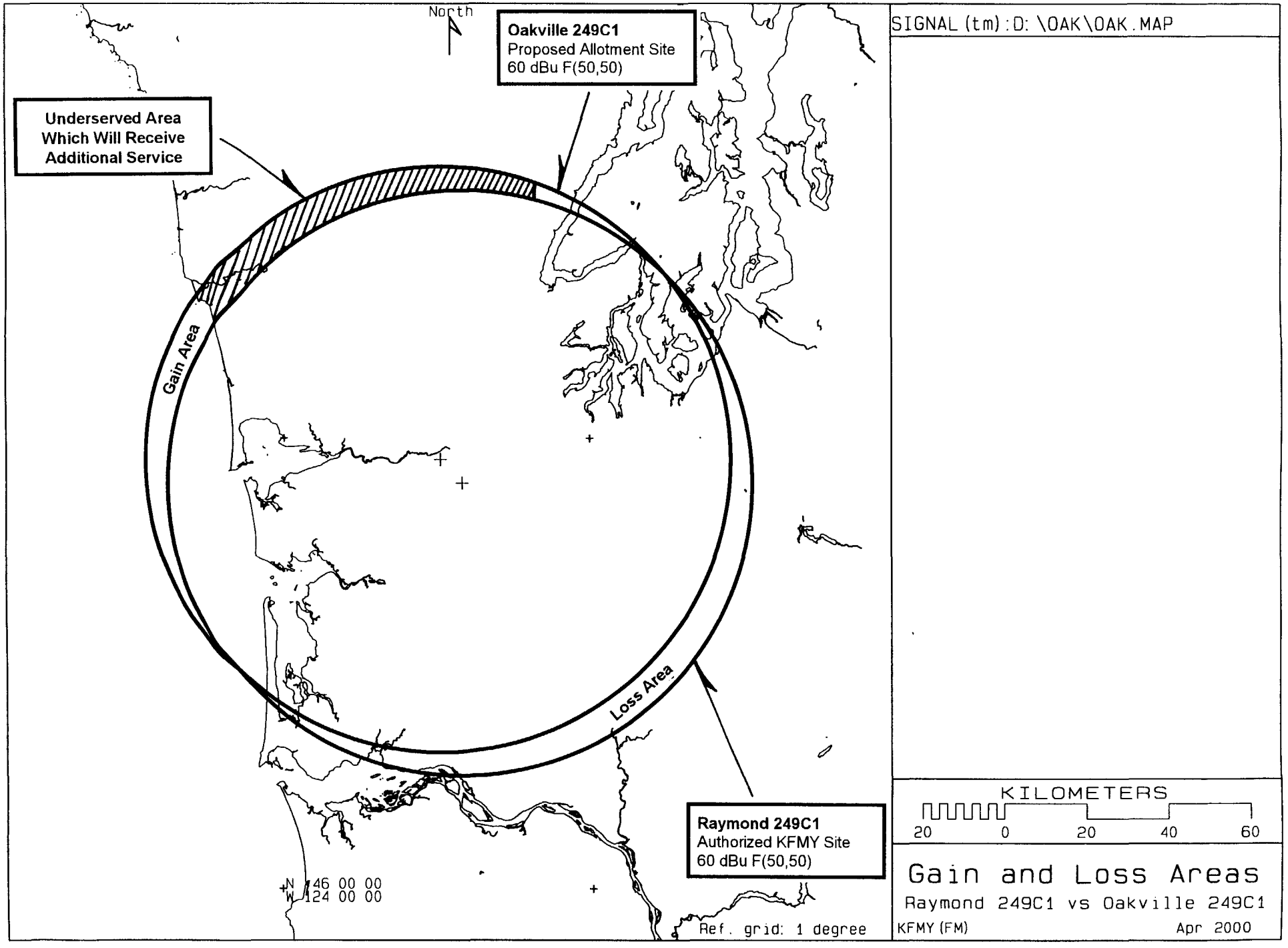
[2]For the purposes of this Engineering Statement, the 60 dBu service areas for commercial FM stations have been calculated assuming maximum facilities for the class of station, with the exception of Class C stations. For Class C stations, the minimum or existing Class C facilities, whichever is greater, have been used. For non-commercial FM stations, existing facilities have been used. Omnidirectional facilities, ignoring terrain effects, have been assumed for all FM stations.

For clear channel Class A stations, the reception area has been defined by the station's 0.5 mV/m groundwave contour, based on licensed facilities. For all other classes of full-time AM stations, reception service has been defined as that service received within the station's nighttime interference-free contour.

continue to receive service from 5 or more stations. A complete list of these stations is included with this Engineering Statement.

A total of 632 km² within the 710 km² gain area are presently underserved, receiving fewer than 5 aural services. A list of the stations serving the gain area is included with this Engineering Statement. Grant of the proposed reallotment would provide 447 presently underserved persons with their second local service.

The attached map exhibit depicts the extents of the hypothetical gain and loss areas, and the extent of the underserved areas described above.


North
Oakville 249C1
Proposed Allotment Site
60 dBu F(50,50)
Underserved Area
Which Will Receive
Additional Service
Gain Area
Loss Area
Raymond 249C1
Authorized KFMY Site
60 dBu F(50,50)
N 46 00 00
W 124 00 00
Ref. grid: 1 degree
SIGNAL (tm): D: \OAK\OAK.MAP
KILOMETERS
20 0 20 40 60
Gain and Loss Areas
Raymond 249C1 vs Oakville 249C1
KFMY (FM)
Apr 2000

AM Stations Providing Service
To Oakville 249C1 Gain Area

Call Status	City St Co	FCC File No.	Freq Mode	Power(kW) Hrs	Cls	Latitude Longitude
KIRO LIC	SEATTLE WA US		710 DAN	50.000 NITE	A	N 47-23-55 W 122-26-01
KIRO LIC	SEATTLE WA US		710 DAN	50.000 DAY	A	N 47-23-55 W 122-26-01
KOMO LIC	SEATTLE WA US	BL19950830AB	1000 DAN	50.000 DAY	A	N 47-27-49 W 122-26-27
KOMO LIC	SEATTLE WA US	BL19950830AB	1000 DAN	50.000 NITE	A	N 47-27-49 W 122-26-27

FM Stations Providing Service
To Oakville 249C1 Gain Area

Call Status	City State FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
KPLUFM	TACOMA	203C	58. DA	47-30-14
LIC	WA BLED890925KA	88.5	714.0	121-58-29
KMUN	ASTORIA	220C2	3.00	46-15-46
LIC	OR BLED830428AA	91.9	328.0	123-53- 9
KLSYFM	BELLEVUE	223C	58. DA	47-30-14
LIC	WA BLH890918KA	92.5	714.0	121-58-29
KASTFM	ASTORIA	225C1	99.	46-10-54
LIC	OR BLH810526AL	92.9	165.0	123-48-19
KUBE	SEATTLE	227C	100.	47-32-39
LIC	WA BLH831004AF	93.3	393.0	122- 6-29
KMPSFM	SEATTLE	231C	58. DA	47-30-14
LIC	WA BLH890912KB	94.1	714.0	121-58-29
KKEE	LONG BEACH	232A	3.00	46-18-51
LIC	WA BLH880401KC	94.3	71.0	124- 3- 7
KUOW	SEATTLE	235C1	100.	47-36-58
LIC	WA BLED850715KJ	94.9	224.0	122-18-28
KJRFM	SEATTLE	239C	100.	47-32-41
LIC	WA BLH810330AK	95.7	360.0	122- 6-28
KYPT	SEATTLE	243C	100.	47-32-39
LIC	WA BLH880705KA	96.5	373.0	122- 6-32
KBSGFM	TACOMA	247C	55.	47-30-14
LIC	WA BLH891018KC	97.3	729.0	121-58-29
KINGFM	SEATTLE	251C	58. DA	47-30-14
LIC	WA BLH921130KC	98.1	714.0	121-58-29
KWJZ	SEATTLE	255C	58.0 DA	47-30-14
LIC	WA BLH970317KB	98.9	714.0	121-58-29

FM Stations Providing Service To Oakville 249C1 Gain Area (Continued)

Call Status	City State FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
KISW	SEATTLE	260C	100.	47-32-41
LIC	WA BLH850916KK	99.9	350.0	122- 6-28
KQBZ	SEATTLE	264C	58.0 DA	47-30-14
LIC	WA BLH970311KA	100.7	714.0	121-58-29
KPLZ	SEATTLE	268C	100.	47-32-42
LIC	WA BLH800925AH	101.5	366.0	122- 6-29
KZOKFM	SEATTLE	273C	100.	47-32-35
LIC	WA BLH6556	102.5	357.0	122- 6-25
KMTT	TACOMA	279C	58. DA	47-30-14
LIC	WA BLH920826KC	103.7	714.0	121-58-29
KCMS	EDMONDS	287C1	115.	47-46- 6
LIC	WA BLH910729KS	105.3	220.0	122-21- 7
KJET	SOUTH BEND	289C2	14.0 DA	46-41-44
LIC	WA BLH990804KC	105.7	290.0	123-46-17
KBKS	TACOMA	291C	58. DA	47-30-14
LIC	WA BLH900320KC	106.1	714.0	121-58-29
KNDD	SEATTLE	299C	58. DA	47-30-14
LIC	WA BLH980508KA	107.7	714.0	121-58-29

AM Stations Providing Service
To Oakville 249C1 Loss Area

Call Status	City St Co FCC File No.	Freq Mode	Power(kW) Hrs Cls	Latitude Longitude
KIRO LIC	SEATTLE WA US	710 DAN	50.000 NITE A	N 47-23-55 W 122-26-01
KIRO LIC	SEATTLE WA US	710 DAN	50.000 DAY A	N 47-23-55 W 122-26-01
KOMO LIC	SEATTLE WA US BL19950830AB	1000 DAN	50.000 DAY A	N 47-27-49 W 122-26-27
KOMO LIC	SEATTLE WA US BL19950830AB	1000 DAN	50.000 NITE A	N 47-27-49 W 122-26-27
KAST LIC	ASTORIA OR US	1370 DAN	1.000 DAY B	N 46-10-30 W 123-50-50
KAST LIC	ASTORIA OR US	1370 DAN	1.000 NITE B	N 46-10-30 W 123-50-50

FM Stations Providing Service
To Oakville 249C1 Loss Area

Call Status	City State FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
KPLUFM	TACOMA	203C	58. DA	47-30-14
LIC	WA BLED890925KA	88.5	714.0	121-58-29
KWFJ	ROY	209A	1.0 DA	46-57-59
LIC	WA BLED950725KA	89.7	30.0	122-32-56
KGHP	GIG HARBOR	210A	1.50 DA	47-14-29
LIC	WA BLED880425KA	89.9	58.0	122-46-14
KZOE	LONGVIEW	212A	.500	46- 9-47
LIC	WA BLED930312KC	90.3	239.0	122-51-14
KVTI	TACOMA	215C1	51.	47- 9-39
LIC	WA BLED910510KA	90.9	111.0	122-34-35
KBTCFM	TACOMA	219C3	7.9 DA	47-18-15
LIC	WA BLED821119AF	91.7	168.0	122-23-44
KMUN	ASTORIA	220C2	3.00	46-15-46
LIC	OR BLED830428AA	91.9	328.0	123-53- 9
KLSYFM	BELLEVUE	223C	58. DA	47-30-14
LIC	WA BLH890918KA	92.5	714.0	121-58-29
KASTFM	ASTORIA	225C1	99.	46-10-54
LIC	OR BLH810526AL	92.9	165.0	123-48-19
KUBE	SEATTLE	227C	100.	47-32-39
LIC	WA BLH831004AF	93.3	393.0	122- 6-29
KMPSFM	SEATTLE	231C	58. DA	47-30-14
LIC	WA BLH890912KB	94.1	714.0	121-58-29
KKEE	LONG BEACH	232A	3.00	46-18-51
LIC	WA BLH880401KC	94.3	71.0	124- 3- 7
KUKN	KELSO	233A	6.00	46-12-54
LIC	WA BLH910905KB	94.5	100.0	123- 2-24

FM Stations Providing Service To Oakville 249C1 Loss Area (Continued)

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
KUOW	SEATTLE		235C1	100.	47-36-58
LIC	WA	BLED850715KJ	94.9	224.0	122-18-28
KITIFM	WINLOCK		236A	0.38	46-32-35
LIC	WA	BLH950501KB	95.1	268.0	123- 1-14
KJRFM	SEATTLE		239C	100.	47-32-41
LIC	WA	BLH810330AK	95.7	360.0	122- 6-28
KXXO	OLYMPIA		241C	85.	46-38- 7
LIC	WA	BLH900308KB	96.1	640.0	122-28- 1
KYPT	SEATTLE		243C	100.	47-32-39
LIC	WA	BLH880705KA	96.5	373.0	122- 6-32
KBSGFM	TACOMA		247C	55.	47-30-14
LIC	WA	BLH891018KC	97.3	729.0	121-58-29
KINGFM	SEATTLE		251C	58. DA	47-30-14
LIC	WA	BLH921130KC	98.1	714.0	121-58-29
KWJZ	SEATTLE		255C	58.0 DA	47-30-14
LIC	WA	BLH970317KB	98.9	714.0	121-58-29
KISW	SEATTLE		260C	100.	47-32-41
LIC	WA	BLH850916KK	99.9	350.0	122- 6-28
KQBZ	SEATTLE		264C	58.0 DA	47-30-14
LIC	WA	BLH970311KA	100.7	714.0	121-58-29
KPLZ	SEATTLE		268C	100.	47-32-42
LIC	WA	BLH800925AH	101.5	366.0	122- 6-29
KZOKFM	SEATTLE		273C	100.	47-32-35
LIC	WA	BLH6556	102.5	357.0	122- 6-25
KMNT	CENTRALIA		275C	100.	46-33-18
LIC	WA	BLH850529KQ	102.9	322.0	123- 3-27

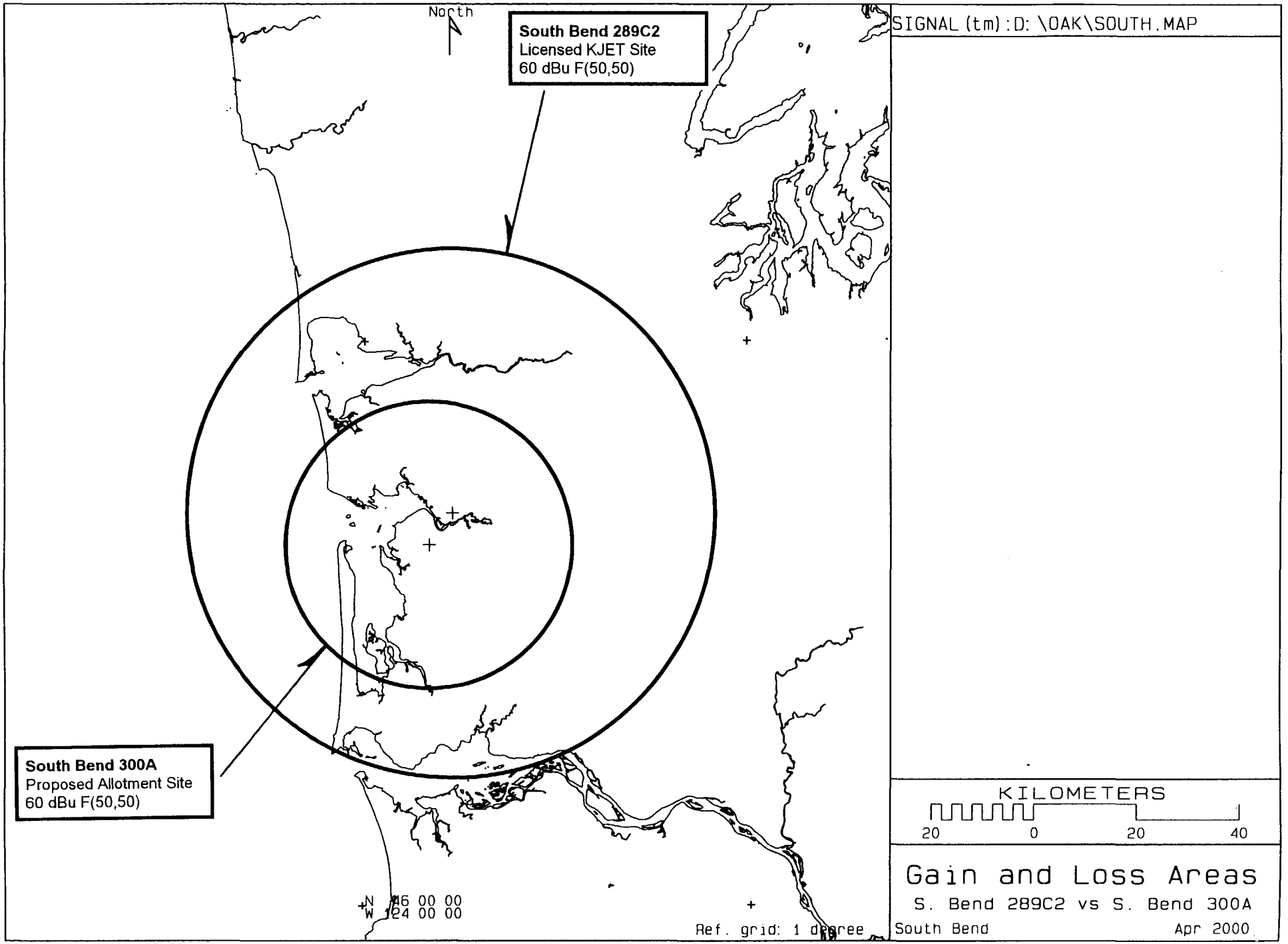
FM Stations Providing Service To Oakville 249C1 Loss Area (Continued)

Call Status	City State FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
KMTT	TACOMA	279C	58. DA	47-30-14
LIC	WA BLH920826KC	103.7	714.0	121-58-29
KFNK	EATONVILLE	285A	2.5	46-50-24
LIC	WA BLH950814KD	104.9	151.0	122-15-27
KCMS	EDMONDS	287C1	115.	47-46- 6
LIC	WA BLH910729KS	105.3	220.0	122-21- 7
KLYK	LONGVIEW	288A	0.70	46- 9-52
LIC	WA BLH941228KE	105.5	262.0	122-51-13
KJET	SOUTH BEND	289C2	14.0 DA	46-41-44
LIC	WA BLH990804KC	105.7	290.0	123-46-17
KBKS	TACOMA	291C	58. DA	47-30-14
LIC	WA BLH900320KC	106.1	714.0	121-58-29
KRWM	BREMERTON	295C1	55. DA	47-32-41
LIC	WA BLH961017KE	106.9	379.0	122- 6-28
KRQT	CASTLE ROCK	296C3	0.74	46-20-35
LIC	WA BLH931029KB	107.1	528.0	123- 5-54
KNDD	SEATTLE	299C	58. DA	47-30-14
LIC	WA BLH980508KA	107.7	714.0	121-58-29

South Bend Channel 289C2 / 300A

The Commission has requested a gain and loss area study with respect to the substitution of Channel 300A for Channel 289C2 at South Bend. As demonstrated by the attached map exhibit, the 60 dBu service area of Channel 300A at South Bend is completely encompassed by the 60 dBu service area of the present operation of KJET(FM) on Channel 289C2 at South Bend.

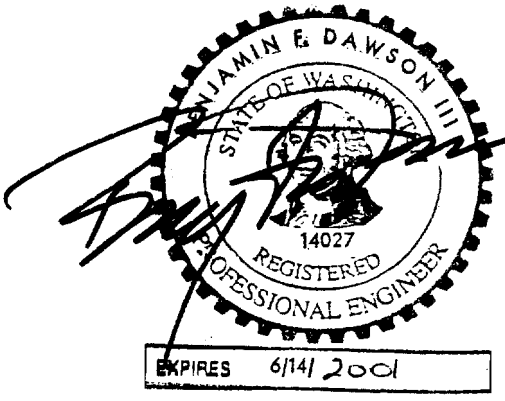
The present operation of KJET on Channel 289C2 at South Bend provides 60 dBu service to 80,841 persons in a 6,052 km² land area. The proposed Channel 300A allotment at South Bend would provide 60 dBu service to 13,797 persons in a 1,942 km² land area. While this superficially appears to indicate a loss of 67,044 persons in a 4,110 km² land area, those figures are misleading. Indeed, while the proposed South Bend Channel 300A allotment would have a smaller service area than the existing KJET South Bend Channel 289C2 facility, any evaluation of the merit of this substitution must be made with consideration to the fact that no site change has been proposed for KJET on Channel 289C2, despite its proposed reallotment from South Bend to Raymond. KJET will continue to operate from its present transmitter site on Holy Cross Hill. Therefore, there will not be any actual loss of service. Those 67,044 persons will retain service from KJET on Channel 289C2 at Raymond, while 13,797 persons will receive additional service from the new South Bend Channel 300A allotment.


North
South Bend 289C2
Licensed KJET Site
60 dBu F(50,50)
South Bend 300A
Proposed Allotment Site
60 dBu F(50,50)
N 46 00 00
W 124 00 00
Ref. grid: 1 degree
SIGNAL(tm):D:\OAK\SOUTH.MAP
KILOMETERS
20
0
20
40
Gain and Loss Areas
S. Bend 289C2 vs S. Bend 300A
South Bend
Apr 2000

Certification of Engineer

This Engineering Statement in support of comments in MM Docket No. 00-41 has been prepared on behalf of Jodesha Broadcasting, Inc. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 21st day of April, 2000.



Benjamin F. Dawson III, P.E.